

EXHIBIT 27

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

Case No. 20-cv-00983

PLAINTIFF ONYX HOMEOWNERS
ASSOCIATION'S ANSWERS AND
RESPONSES TO DEFENDANT CITY OF
SEATTLE'S FIRST DISCOVERY
REQUESTS

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, Plaintiff Onyx Homeowners Association ("Onyx" or "Plaintiff") hereby responds and objects to Defendant City of Seattle's ("Defendant" or the "City") First Discovery Requests containing Defendant's first sets of Interrogatories and Requests for Production. No admissions of any nature whatsoever are implied or should be inferred from the answers, responses, and objections set forth below. Plaintiff has answered these requests based on its current knowledge and understanding with respect to the matters addressed. Discovery in this action is on-going. Plaintiff reserves its right to alter, supplement, modify, or otherwise amend its responses as necessary or appropriate.

1 have no relevance to the claims or defenses in this case. Plaintiff further objects to this request in
 2 so far as it calls for production of documents not in Plaintiff's possession or documents that are
 3 otherwise publicly available and equally available to the City.

4 Without waiving any objection, and subject to continuing investigation, Plaintiff will
 5 conduct a reasonable search for documents in its possession relevant to the claims and defenses
 6 in this case and will produce responsive, non-privileged documents, if any, within a reasonable
 7 time, on a rolling basis.

8 **REQUEST FOR PRODUCTION NO. 7:**

9 Please produce all documents (including without limitation emails and texts) reflecting any
 10 communications between any plaintiff and any other person or business concerning any of the
 11 CHOP activities alleged in the complaint.

12 **RESPONSE:**

13 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,
 14 and duplicative in so far as it calls for the production of "all" documents and communications
 15 involving any person, plaintiff, or business. Plaintiff further objects to this request in so far as it calls
 16 for production of documents not in Plaintiff's possession or documents that are otherwise publicly
 17 available and equally available to the City.

18 Without waiving any objection, and subject to continuing investigation, Plaintiff will
 19 conduct a reasonable search for documents relevant to the claims and defenses in this case and will
 20 produce responsive, non-privileged documents, if any, within a reasonable time, on a rolling basis.

21 **REQUEST FOR PRODUCTION NO. 8:**

22 Please produce all documents reflecting any damages you claim to have suffered as a result
 23 of any "lack of public-safety assistance" alleged in the complaint.

24 **RESPONSE:**

25 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,

1 and will produce responsive, non-privileged documents, if any, within a reasonable time, on a
2 rolling basis.

3
4 DATED this 15th day of January, 2021.

5 By /s/ Patty A. Eakes

6 Patricia A. Eakes, WSBA #18888

7 Angelo J. Calfo, WSBA #27079

8 Tyler S. Weaver, WSBA #29413

9 Andrew DeCarlow, WSBA #54471

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20 *Attorneys for Plaintiffs*

RESPONSES dated this 11th day of January, 2021.

ONYX HOMEOWNERS ASSOCIATION

By: _____
Its: Board President

VERIFICATION

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

Wade Biller, being duly sworn, on oath says:

That he/she is the Board President of ONYX HOMEOWNERS ASSOCIATION;
that he/she has read the answers and responses to CITY OF SEATTLE'S FIRST DISCOVERY
REQUESTS TO PLAINTIFF ONYX HOMEOWNERS ASSOCIATION, knows the contents
thereof and believes the same to be true and correct.

SUBSCRIBED AND SWORN TO before me this _____ day of _____,
2021.

[PRINT NAME]
NOTARY PUBLIC in and for the State of Washington,
residing at _____
My appointment expires: _____